

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ROBERT VELASQUEZ

§

Plaintiff,

§

v.

CASE NO. 4:18-cv-03897

§

**WRIGHT NATIONAL FLOOD
INSURANCE COMPANY,**

§

Defendant.

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CONSENT MOTION TO MODIFY SCHEDULING ORDER

Plaintiff Robert Velasquez, by counsel, with the consent of Defendant Wright National Flood Insurance Company (“Wright” or “Defendant”), by counsel, for its Consent Motion to modify and extend the expert disclosure deadlines prescribed by the Court’s Scheduling Order (Doc. 14), respectfully submits as follows:

1. Subject to the Court’s approval, the parties have conferred and agree that the expert designation / disclosure deadlines prescribed by paragraphs 2a and 2b of the Scheduling Order should be extended by fourteen days for each party – to wit, designation of experts by the Plaintiff (including disclosure of expert reports) must take place by August 14, 2019, and designation of experts by the Defendant (including disclosure of expert reports) must take place by September 13, 2019.

2. Plaintiff, Robert Velasquez, with the consent of Defendant, Wright National Flood Insurance Company, asks this Honorable Court to grant its Consent Motion and modify paragraphs 2a and 2b of the Scheduling Order to provide that designation of experts by the Plaintiff (including disclosure of expert reports) must take place by August 14, 2019, and designation of experts by

the Defendant (including disclosure of expert reports) must take place by September 13, 2019. A proposed Agreed Order is filed herewith.

Dated: July 19, 2019

Respectfully submitted,

/s/ Shane McClelland
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Counsel for Plaintiff

CERTIFICATE OF CONFERENCE

I hereby certify that on July 19, 2019, counsel for Plaintiff conferred with counsel for Defendant Wright National Flood Insurance Company regarding the substance of the relief requested, and Defendant agrees. This motion is agreed.

/s/ Shane McClelland
Shane McClelland

CERTIFICATE OF SERVICE

I hereby certify that on July 19, 2019, a true copy of the foregoing CONSENT MOTION TO MODIFY SCHEDULING ORDER has been served upon all counsel of record contemporaneously with or before the filing of this pleading, in a manner authorized by Federal Rule of Civil Procedure 5(b)(1), using this Court's CM/ECF system.

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/s/ Shane McClelland

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